

EXHIBIT I

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

BROIDY CAPITAL MANAGEMENT, LLC and
ELLIOTT BROIDY,

Plaintiffs,

v.

NICHOLAS D. MUZIN, JOSEPH ALLAHAM,
GREGORY HOWARD, STONINGTON
STRATEGIES, LLC,

Defendants.

Case No. 19-cv-00150-DLF

**CIRCINUS, LLC’S RESPONSES & OBJECTIONS TO GREGORY HOWARD’S
DOCUMENT SUBPOENA**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Circinus, LLC (“Circinus”) hereby responds and objects to the Document Subpoena to Circinus (the “Requests,” and individually, a “Request”) by Defendant Gregory Howard (“Howard”) as follows.

GENERAL OBJECTIONS

1. The General Objections set forth below apply to the Requests generally and to the Requests, definitions (“Definitions”), and instructions (“Instructions”) set forth therein. Unless otherwise stated, the General Objections shall have the same force and effect as if set forth in full in response to each Definition, Instruction, and Request. Circinus expressly reserves the right to revise, amend, correct, supplement, or clarify its responses, objections, and any production in response to the Requests. Any supplemental or amended response shall not function as a waiver of any privilege, immunity, or objection.

2. Circinus objects to the Requests to the extent they seek production of documents or information that are protected from disclosure by: (i) the attorney-client privilege; (ii) the work

product doctrine; (iii) investigative and consulting expert privileges; and/or (iv) any other applicable privilege, doctrine or immunity from disclosure, including but not limited to domestic or foreign criminal or civil laws.

3. Circinus objects to each of Howard's Definitions, Instructions, and Requests to the extent they are unduly burdensome and overbroad in scope, including insofar as any Request seeks the production of "all" documents related to a particular subject matter.

4. Circinus objects to the Requests on the ground that they each purport to seek "all" requested documents that may exist, which is unduly burdensome and not required by the Federal Rules of Civil Procedure or the Local Rules.

5. Circinus objects to the Requests to the extent that they seek to impose obligations on Circinus greater than those imposed by the Federal Rules of Civil Procedure and the Local Civil Rules of the District of Columbia.

6. Circinus objects to the Requests to the extent they seek documents and information that are not in Circinus' possession, custody, or control, or that are equally available to Howard from sources other than Circinus, including from Howard.

7. Circinus objects to the Requests to the extent they are vague, ambiguous, and confusing and/or require Circinus to engage in conjecture or speculation as to their meaning in responding the Requests.

8. Circinus objects to the Requests to the extent they require Circinus to draw legal conclusions.

9. Circinus objects to the Requests to the extent any Request is repetitive and/or duplicative of requests already made by other defendants, including those in the subpoena served

by Nicholas D. Muzin and Stonington Strategies, LLC, which, as Howard is aware, sought similar categories of information.

10. Circinus objects to the Requests to the extent they call for disclosure of confidential, proprietary or private information.

OBJECTIONS TO THE DEFINITIONS AND INSTRUCTIONS

1. Circinus objects to the Definitions of “Circinus,” “You,” and “Your” on the grounds that they include persons that are not subject to Circinus’ control and are overly broad.

2. Circinus objects to the Requests to the extent they call for the production of documents beginning January 1, 2016. Circinus will search for responsive documents created on or after December 1, 2017.

3. Circinus objects to the Definitions of “Republic of Angola,” “Angola,” “Morocco,” “Romania,” “Malaysia,” “Nigeria,” and “the Republic of Congo,” “the Republic of Tunisia,” “Tunisia,” and “the Kurdistan Regional Government,” as overly broad and containing persons whom Circinus may not know are affiliated with these countries and/or entities.

SPECIFIC RESPONSES & OBJECTIONS

REQUEST NO. 1

All documents and communications (whether in draft or final form) regarding Your or Broidy’s advocacy, lobbying, or consulting (or proposed advocacy, lobbying, or consulting) on behalf of: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola.

RESPONSE TO REQUEST NO. 1

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged

information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 2

All documents and communications regarding Your business dealings with: (a) Angola, or (b) any officials, agents, or representatives of Angola.

RESPONSE TO REQUEST NO. 2

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 3

All documents and communications regarding Broidy's business dealings with: (a) Angola, or (b) any officials, agents, or representatives of Angola.

RESPONSE TO REQUEST NO. 3

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 4

All documents and communications regarding registration statements that You have submitted to the U.S. Department of Justice under the Foreign Agents Registration Act, related to Angola.

RESPONSE TO REQUEST NO. 4

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 5

All non-privileged documents and communications regarding Your decision whether or not to file a registration statement with the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to Angola.

RESPONSE TO REQUEST NO. 5

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 6

All documents and communications relating to any financial transactions or exchanges of anything of value, whether directly or through an intermediary, between Circinus and Angola.

RESPONSE TO REQUEST NO. 6

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 7

All documents and communications relating to Your receipt of anything of value, either directly or indirectly, from Angola.

RESPONSE TO REQUEST NO. 7

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 8

All documents and communications regarding monetary payments or donations made by or received by You or Broidy from: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola.

RESPONSE TO REQUEST NO. 8

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 9

All documents and communications regarding contracts, agreements, pitches, proposals, bids, or other similar arrangements sought or entered into by Circinus regarding Angola.

RESPONSE TO REQUEST NO. 9

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged

information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 10

All communications with Broidy, his agents, or his representatives, including without limitation lawyers at Boies Schiller Flexner LLP and Latham & Watkins, regarding: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 10

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 11

All documents and communications regarding any meetings discussed, proposed, planned, arranged, or conducted between or among: (a) Angola, or any official, agent, or representative of that country, including without limitation João Manuel Gonçalves Lourenço and André de Oliveira João Sango; and (b) any U.S. Senator, U.S. Congressman, member of the Trump Administration (including President Donald Trump), member of President Trump's family, Trump presidential campaign staff member, Save America PAC staff member, America First Action PAC staff member, Make America Great Again Action PAC staff member, Make America Great Again, Again PAC staff member, or Trump Administration transition team member.

RESPONSE TO REQUEST NO. 11

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 12

All documents and communications regarding efforts by Broidy to obtain invitations to President Trump's inauguration for any official, agent, or representative of Angola, including without limitation João Manuel Gonçalves Lourenço and André de Oliveira João Sango.

RESPONSE TO REQUEST NO. 12

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 13

All communications with President Donald Trump and/or members of President Trump's family; White House staff; Trump presidential campaign staff; Save America PAC staff; America First Action PAC staff; Make America Great Again Action PAC staff; Make America Great Again, Again PAC staff; or Trump Administration transition team members; or the agents or representatives of any of the individuals or organizations identified in this Request, regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 13

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 14

All communications with any U.S. Senator or U.S. Congressman and/or members of any Senator's or Congressman's staff regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 14

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 15

All communications with any U.S. Cabinet Members or their staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 15

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 16

All communications with Senator Tom Cotton or his staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 16

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 17

All communications with Senator Ron Johnson or his staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 17

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 18

All communications with former Congressman Ed Royce or his staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 18

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 19

All communications with former Congresswoman Ileana Ros-Lehtinen or her staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 19

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged

information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 20

All documents and communications that refer or relate to lobbying or advocacy activities concerning Grupo Simples Oil.

RESPONSE TO REQUEST NO. 20

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 21

All documents and communications (whether in draft or final form) regarding Your or Broidy's advocacy, lobbying, or consulting (or proposed advocacy, lobbying, or consulting) on behalf of: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 21

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 22

All documents and communications regarding Your business dealings with: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the

Kurdistan Regional Government, or (b) any officials, agents, or representatives of Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 22

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 23

All documents and communications regarding Broidy's business dealings with: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, or (b) any officials, agents, or representatives of Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 23

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 24

All documents and communications regarding registration statements that You have submitted to the U.S. Department of Justice under the Foreign Agents Registration Act, related to Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 24

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an

improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 25

All non-privileged documents and communications regarding Your decision whether or not to file a registration statement with the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 25

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 26

All documents and communications relating to any financial transactions or exchanges of anything of value, whether directly or through an intermediary, between Circinus and Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 26

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 27

All documents and communications relating to Your receipt of anything of value, either directly or indirectly, from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 27

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 28

All documents and communications regarding monetary payments or donations made by or received by You or Broidy from: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 28

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 29

All documents and communications regarding contracts, agreements, pitches, proposals, bids, or other similar arrangements sought or entered into by Circinus regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.

RESPONSE TO REQUEST NO. 29

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged

information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 30

All communications with Broidy, his agents, or his representatives, including without limitation lawyers at Boies Schiller Flexner LLP and Latham & Watkins, regarding: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 30

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 31

All documents and communications regarding any meetings discussed, proposed, planned, arranged, or conducted between or among: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, or any of their officials, agents, or representatives; and (b) any U.S. Senator, U.S. Congressman, member of the Trump Administration (including President Donald Trump), member of President Trump's family, Trump presidential campaign staff member, Save America PAC staff member, America First Action PAC staff member, Make America Great Again Action PAC staff member, Make America Great Again, Again PAC staff member, or Trump Administration transition team member.

RESPONSE TO REQUEST NO. 31

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged

information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 32

All communications with President Donald Trump and/or members of President Trump's family; White House staff; Trump presidential campaign staff; Save America PAC staff; America First Action PAC staff; Make America Great Again Action PAC staff; Make America Great Again, Again PAC staff; or Trump Administration transition team members; or the agents or representatives of any of the individuals or organizations identified in this Request, regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 32

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 33

All communications with any U.S. Senator or U.S. Congressman and/or members of any Senator's or Congressman's staff regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 33

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

REQUEST NO. 34

All communications with any U.S. Cabinet Members or their staff, agents, or representatives regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.

RESPONSE TO REQUEST NO. 34

Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

Dated: January 28, 2022

KASOWITZ BENSON TORRES LLP

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